



ILLINOIS
**CORN
GROWERS**
ASSOCIATION

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Mississippi River/Gulf of Mexico Action Plan (4503F)
c/o U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Hypoxia Action Plan (4503F)

Thank you for the opportunity to offer comments from the Illinois Corn Growers Association (ICGA) regarding the draft Action Plan published in the Federal Register on July 11, 2000 addressing controlling hypoxia in the northern Gulf of Mexico. ICGA is trade association representing corn producers in Illinois and as such we have a significant interest in this topic.

Science First

You will be receiving abundant information from other groups documenting problems or concerns with the draft report so I will keep our comments short and to the point. First and foremost ICGA is concerned the hypoxia issue has become largely political and from the public perspective it is being tainted by emotion rather than reason.

There are several key flaws with the draft proposal which provide enough reason to reevaluate the report and the entire approach to the issue at this point. The federal agencies appear to be unwilling to reconsider their analyses or reevaluate their conclusions in light of new data or new perspectives on existing data. We need to step back and re-establish focus on the issue from a strictly science-based perspective, while also being mindful of the significant impact this report will have on rural and urban areas of Illinois.

Farming Management Has Changed

The draft report also seems heavily slanted toward regulatory controls rather than a growing commitment to proven voluntary mechanisms. ICGA continues to be concerned about the aggressive pursuit of quantitative goals on this issue when so many questions remain unresolved. ICGA believes EPA should go on record that it will not base nutrient criteria or standards based on postulated links to the Gulf of Mexico.

Agriculture has made, and continues to make, remarkable gains in addressing soil management and

water quality. Farm management techniques today have changed to the point of being almost unrecognizable to our fathers and grandfathers.

Today, nitrogen rates per bushel have decreased significantly. Corn growers have cut nitrogen application rates by 22 percent from 1984 to 1998. Most growers today are using 1.02 pounds of nitrogen today compared to 1.31 in 1984, according to the University of Illinois.

ICGA is working to expand and accelerate this trend through promoting government conservation incentives and through direct producer education efforts on proper nitrogen application rates and other Best Management Practices.

“T” By 2000

One of the best ways to address phosphorus movement to water, and to some degree nitrogen, without adversely effecting farmer's optimal yields is to fight soil erosion. Phosphorus and nitrogen in runoff from farm fields has been a concern in the past, and continues to be a concern. However, we have made significant gains in fighting erosion, and thus nutrient movement, through the “T” by 2000 program. The “T” stands for tolerable soil loss and relates to lowering soil loss to a level that nature can replace any minimal soil losses.

Keeping the soil in place, and the nutrients in the soil profile, allows plants to utilize the nitrogen directly or for natural degradation of the nutrients to take place. We have almost attained “T” across Illinois. Conservation tillage, conservation buffers, soil testing, variable rate technology, integrated pest management, global positioning, precision agriculture techniques, and biotechnology are providing us with new tools and success stories. And perhaps most significant of all is the nitrogen application education program being conducted by the Council on Best Management Practices, of which ICGA is a member. This program seeks to raise awareness of the optimal amount of nitrogen to apply to get top yields, without additional expenses or environmental impact.

Agriculture is doing its part in addressing environmental issues through ongoing voluntary programs. The industry has earned the right to fair treatment on the Hypoxia issue and this will only come about if impartial science rules our choices and decides our future direction.

Heavy handed and cumbersome regulations, excessive taxes or outside entities trying to micro-manage a farmers business operations will not provide a long term or sustainable resolution on this issue. Unbiased scientific evidence is a must, and once obtained, will help guide agriculture in additional steps which may be needed.

Economic Considerations

The economic analysis driving the draft report is also flawed because an aggregate analysis of the effects within the entire nation or the whole Mississippi River Basin does not reveal the severe economic disruptions to agriculture in states like Illinois and Iowa. Both would appear to be heavily targeted as potential nitrogen sources. The report focuses on the value of Gulf fisheries (\$2.8 billion annually) but fails to address the linkage to commodities exported each year that result in \$9 billion in cash receipts.

Given these economic contributions, we can not move forward based upon insufficient or erroneous information. The model used reflects a misunderstanding of the role of nitrogen , its role in crop

production practices, and it's movement within the physical river system.

For example, table 41. Of the Topic 6 report (p. 26) indicates that only 2.5 percent of the nitrogen loss from a continuous corn rotation is lost through leaching and most of the remainder (75% of the total lost) is nitrogen lost in sediment. In reality, nitrogen loss from cropland is primarily associated with subsurface drainage while phosphorus loss is primarily due to surface runoff and erosion. This is why voluntary educational efforts like that mentioned previously are so important.

From the economic perspective some of the areas proposed for wetland restoration would be difficult to enroll in a wetland or riparian area programs because of per acre values of more than \$4,000 an acre. These soils are some of the most productive in the state and the lost yield would be proportionally higher. The economic drain from removing millions of acres of prime farmland from production would effect all of Illinois.

Summary

In summary, ICGA opposed adoption of the Action Plan in its current form because some of the proposed solutions would result in:

- Millions of acres of prime farmland in Illinois being converted to wetlands or riparian areas,
- Levee Districts would be flooded,
- The viability of Illinois agriculture would be threatened, and
- Destructive regulations with little consideration given to the success of voluntary programs.

We oppose adoption because the economic analyses:

- fails to identify any measurable negative effect on fisheries in the Gulf,
- have inadequately assessed the impact on Illinois agriculture, and
- have not considered the social cost of lost production and lost jobs.

ICGA will oppose the adoption of the draft action plan until:

- Quantitative goals for reduction of total nitrogen loadings to the Gulf are removed.
- A proper analysis of economic and social costs and benefits is conducted.
- The plan empowers states to have more input and develop its own methods of reaching in-state goals for fishable, swimmable, or drinkable water.

Finally, for such a program to succeed, it is critical the plan has the support from the chief executive officers of the effected states. Governors from these states must have input if the program is to be truly voluntary. It was clearly the intent of Congress for the governors of the 31 affected states to concur with the Action Plan prior to its initiation.

Thanks you for your consideration.

Respectfully submitted,

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